



Partners  
Dawn M. Cardi  
Chad L. Edgar

Associates  
Jessica Friedrich  
Joanna C. Kahan

Of counsel  
Diane Ferrone

May 21, 2021

**Via ECF**

Hon. Victor Marrero  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Andrew Burrell, 19-cr-643 (VM)

Your Honor:

I am CJA counsel to Andrew Burrell. I write to respectfully request that the Court order that the Bureau of Prisons provide me with Mr. Burrell's medical records for the last week. We believe Mr. Burrell was recently involved in an incident and is currently in the hospital. Upon learning this information, we immediately reached out to MDC legal and were informed that they cannot disclose any information without a signed HIPAA, and that at present time, the BOP does not have the means to have Mr. Burrell consent to release of his records to counsel. The MDC legal department advised that requesting an Order from the Court would be the best route to protect all parties involved. Accordingly, I respectfully request that Your Honor grant the request herein. Thank you.

Thank you for your consideration of the instant application.

Respectfully submitted,

/s/

Dawn M. Cardi

